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RECEIVED

MAY 31 2000

FCC MAIL ROOM

RE: Comments of Metro One Telecommunications, Inc. in CC Docket Nos. 99-273
and 98-67 Telegate's Proposal for Presubscription to "411" Directory
Assistance Services

Dear Ms. Salas:

On behalf of Metro One Telecommunications, Inc. ("Metro One"), we submit
herewith for filing an original and four (4) copies of Comments in the above-referenced
proceeding.

PAUL, HASTINGS, JANOFSKY & WALKER LLP

Ms. Magalie R. Salas
May 30, 2000
Page 2

We also enclose an extra copy of this transmittal letter that is to be date-stamped and returned in the envelope provided. Should any questions arise regarding this submission, please contact Metro One's undersigned legal counsel.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michelle W. Cohen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michelle W. Cohen
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

Enclosures

cc: Mr. Al McCloud (via separate letter w/two copies)

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

TELEGATE'S PROPOSAL FOR
PRESUBSCRIPTION TO "411" DIRECTORY
ASSISTANCE SERVICES

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)

CC DOCKET NO. 99-273
CC DOCKET NO. 98-67

COMMENTS OF METRO ONE TELECOMMUNICATIONS, INC.

RECEIVED

MAY 31 2000

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May 30, 2000

SUMMARY

The Commission has recognized that competition in the directory assistance ("DA") market furthers the public interest. However, Telegate's proposal to require "411" presubscription or balloting is not an effective means to foster competition in the DA market, which is dominated by the incumbent local exchange carriers and two well-known interexchange carriers. Many alternative DA providers, including Metro One, primarily serve other carriers, such as competitive local exchange carriers ("CLECs") and wireless carriers. The provision of DA to these carriers' end-user customers is seamless, such that the end-users are not aware that an alternative DA provider, rather than the underlying carrier, provides the DA service. Since most end-users simply associate DA with their incumbent carrier, it is highly unlikely that they would presubscribe to a competitive DA provider.

Thus, if the Commission requires a presubscription/balloting process, a few well-known carriers will continue to dominate the DA market. This result could be disastrous for the nascent DA industry. Metro One and other competitive DA providers have fostered innovative services and lowered prices. The Commission has acknowledged that alternative DA providers offer a viable substitute for the incumbent carriers' DA services that serves the interests of CLECs, other carriers, and end-users.

Metro One believes that the alternative proposal to use "411XX," "10-10" or "555" would benefit the public interest by allowing end-users to choose their DA providers, while ensuring that a predisposed presubscription process does not block alternative DA providers. The "411XX" system would also maintain the universally

recognized code “411” for DA. However, if the Commission adopts a “411XX,” “10-10” or “555” system, it must mandate that the services be made available and activated promptly and that the rates for the services be nondiscriminatory and cost-based. In so doing, the Commission will meet the Telecommunications Act of 1996’s fundamental objective to bring consumers the full benefits of competition.

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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
TELEGATE'S PROPOSAL FOR)	CC DOCKET NO. 99-273
PRESUBSCRIPTION TO "411" DIRECTORY)	CC DOCKET NO. 98-67
ASSISTANCE SERVICES)	

COMMENTS OF METRO ONE TELECOMMUNICATIONS, INC.

Metro One Telecommunications, Inc. ("Metro One"), by its attorneys, and pursuant to Sections 1.415 and 1.419 of the Federal Communications Commission's (the "Commission") Rules,¹ hereby submits its Comments on *Telegate's Proposal for Presubscription to "411" Directory Services*, DA 00-930 (rel. Apr. 27, 2000) (the "Notice"). The following is respectfully shown:

I. INTRODUCTION AND BACKGROUND

Metro One is a national provider of enhanced information and telecommunications services. It is certified to provide directory assistance ("DA") and toll services in Oregon and California, holds a Carrier Identification Code, and has obtained an Operating Company Number issued by the National Exchange Carrier Association. Metro One's services currently include the provision of Enhanced Directory Assistance ("EDA"), with both intraLATA and interLATA live operator-assisted call completion, to end-users of various national and regional cellular and personal communications services ("PCS") telephone companies. Metro One also offers its

¹ 47 C.F.R. §§ 1.415, 1.419.

services to landline-based carriers, including competitive local exchange carriers ("CLECs").

Metro One is headquartered in Beaverton, Oregon and has 28 DA call centers located throughout the United States. Metro One has built multiple call centers to better serve its customers with operators who can provide in-depth knowledge of local information. One or more of Metro One's DA call centers are located in each of the Regional Bell Operating Company ("RBOC") operating areas. Metro One's EDA services enable end-users to obtain "traditional" DA (*i.e.*, telephone numbers of individuals and entities), as well as a host of enhanced services. Metro One's EDA services include movie listings, information on local events (such as concerts and sporting events), geographic directions, weather warnings, and school closings.

As Metro One is a leading provider of DA to CLECs and mobile carriers, both Metro One and Metro One's carrier clients would be directly affected by Telegate's proposal in the DA proceeding² to require presubscription to "411."

II. DISCUSSION

A. **Neither "411" Presubscription nor Balloting are Effective Means to Open the DA Market to Competition, Irrespective of Whether Such Measures are Technically Feasible or Economically Viable**

In the *Notice*, the Common Carrier Bureau (the "Bureau") seeks comment on the technical feasibility and economic viability of requiring local exchange carriers ("LECs") to implement presubscription to "411."³ The Bureau also seeks comment on "whether balloting would be the most equitable and procompetitive manner of

² CC Docket No. 99-273. Metro One previously filed comments and reply comments in Docket No. 99-273, and incorporates its comments and reply comments by reference.

³ *Notice* at 2.

implementing '411' presubscription; or whether there is a better alternative to balloting.”⁴ Metro One opposes “411” presubscription, as that process would allow a few carriers to maintain their dominance in the DA industry, and would thwart the pro-competitive goals of the Telecommunications Act of 1996 (the “1996 Act”).

As background, currently most wireline DA is provided by the major incumbent local exchange carriers (“ILECs”) or by MCI and AT&T. The Commission has recognized that ILECs in particular possess competitive advantages in the provision of DA service stemming from their dominant positions in the local exchange and exchange access markets.⁵

A substantial portion of wireless carriers’ DA is served by competitive DA providers such as Metro One. In addition, as set forth in Metro One’s (and other providers’) comments and reply comments in CC Docket 99-273, alternative DA providers have essentially become the “directory assistance department” of many CLECs and wireless carriers since these carriers generally have not established their own DA capability. The costs of building and staffing call centers, buying necessary computers and equipment, and acquiring quality DA listings are substantial and a main reason why many CLECs and wireless carriers outsource their DA service to Metro One and other providers.⁶ The Commission has acknowledged that DA services can “make or break” a CLEC’s ability to retain customers;⁷ as such, CLECs have come to rely upon alternative

⁴ *Id.* at 3.

⁵ See, e.g., *Petition of U S WEST Communications, Inc. for a Declaratory Ruling Regarding the Provision of National Directory Assistance*, 14 FCC Rcd. 16252, ¶ 35 (1999) (“U S WEST Order”) (“the competitive advantages U S WEST enjoys with respect to the provision of directory assistance service throughout its region stem from its dominant position in the local exchange and exchange access markets”).

⁶ See Comments of Metro One Telecommunications, Inc. in CC Docket 99-273 at 17-18 (filed Oct. 13, 1999) (“Metro One Comments”).

⁷ See, e.g., *Performance Measurements and Reporting Requirements for Operations Support*

DA providers for this critical component of their service offerings.

Most end-user customers of competitive DA providers are pleased by the professional and helpful services they receive when using the DA services. Metro One's and other alternative DA providers' innovative DA services have spurred improvements in DA, and the incumbent carriers have replicated some of these services in order to remain competitive. As Metro One's Comments in CC Docket 99-273 noted:

Competitive DA providers focus on customer service and attractive pricing and have competed with the ILECs by developing innovative features and services. Such innovative services created by a competitive DA provider include: National Directory Assistance ("NDA") provided through a single number; [and] enhanced information services ... many of the RBOCs, responding to competition in the DA market, have recently replicated DA improvements, such as NDA and EDA services.⁸

However, end-users generally do not know that the DA service is provided by an alternative DA provider, rather than "in-house" by the wireless or wireline carrier. Most agreements between carriers and alternative DA providers require that DA providers not identify their company to end-users, and that DA operators present the DA service as a seamless component of the underlying carrier's services. Thus, when an end-user of one of Metro One's carrier customers presses "411" for DA, Metro One's DA operators answer by identifying themselves as the carrier's directory assistance.

Therefore, most telephone subscribers and DA users do not even know that competitive DA providers exist (and do not correlate the high quality of DA services they have received with alternative providers). As such, it would be highly unlikely that end-users would presubscribe to any of the competitive DA providers other than those

Systems, Interconnection, and Operator Services and Directory Assistance, Notice of Proposed Rulemaking, 13 FCC Rcd. 12817, 12858 (1998).

⁸ Metro One Comments at 2.

few well-known providers who widely promote such services as adjunct to their existing telecommunications services, such as AT&T or MCI.

Metro One has invested a great deal in new network infrastructure to provide quality DA services (*e.g.*, building and staffing localized call centers, hiring and training operators and purchasing DA listings from the ILECs). If the Commission implements presubscription, Metro One believes that the DA market will end up being allocated in much the same way it is currently structured – dominated by a few well-known incumbent carriers – with additional costs (*e.g.*, high promotional costs incurred by competitive DA providers to promote themselves for end-user selection, and network modification costs). Ultimately, such a presubscription system would likely stunt or seriously harm the development of the competitive DA industry, just as the telecommunications industry as a whole is benefiting from alternative DA sources. Such a situation could prove harmful both for competitive DA providers and new competitive carriers, such as CLECs, who rely on alternative DA providers for quality services at competitive rates to serve the new carriers' customer bases.

B. Better, Lower Cost Alternatives to “411” Presubscription Exist, Including the Use of “411XX,” “10-10” or “555” Access Codes for DA Service

The Bureau seeks comment on whether a lower cost alternative to “411” presubscription to open the DA market to competition would be to require the provision of DA services by all competing entities through “10-10 access codes.”⁹ Metro One believes “10-10” access codes would be a better, lower cost alternative to “411” presubscription. Access via a “555” code might also be an effective alternative to “411” presubscription. However, Metro One has found that most ILECs will not activate Metro One’s assigned “555” numbers. If the Commission implements “10-10” or “555” as alternatives to “411” presubscription, the Commission must promulgate and enforce rules and adopt procedures to ensure that both “10-10” and “555” services are made available and activated promptly and that the rates for the services are nondiscriminatory and cost-based.

Metro One believes that the most equitable solution – and possibly the easiest for the Commission to implement – would be to assign a two or three digit suffix to the “411” access code, with every DA provider, including the ILECs, having its own “411XX” code. This system would even the playing field for competitive DA providers, while preserving the “411” code – which the Commission has recognized is the “nationally-recognized telephone number” for the provision of DA services.¹⁰

Ultimately, the Commission would be serving the public interest by allowing end-users to choose their DA providers, while ensuring that a biased presubscription process does not block alternative DA providers. As Telegate previously

⁹ Notice at 3.

¹⁰ U S WEST Order, ¶ 43.

advocated, the Commission could find precedent and experience for this arrangement in the European markets, where each provider is allocated “a unique dialing code by which customers can access the DA service of their choosing. This service has proved to foster competition in Europe and improve the quality of service.”¹¹ The record in this docket demonstrates that new DA providers have spurred innovative, informative, and attractively priced DA services. By adopting a “411XX,” “10-10” or “555” system, the Commission would continue these pro-competitive, pro-consumer developments, thereby furthering Congress’s goal in the 1996 Act to open *all* telecommunications markets to full and fair competition.

C. A DA Database Administrator is not Necessary if Competitive DA Providers are Allowed Non-Discriminatory Access to the DA Listing Databases of the ILECs

The Bureau seeks comment on whether a DA database administrator would be necessary and how such an administrator would be chosen.¹² As explained in greater detail below, Metro One believes that a DA database administrator is not necessary to ensure information in the database is up-to-date, provided that the Commission requires in docket 99-273, that competitive DA providers have non-discriminatory access to ILECs’ DA listing databases.

As Metro One and other commenters in this proceeding have demonstrated, if alternative DA providers are to remain competitive, they must have an even playing field, with non-discriminatory access to all of the DA listings (including

¹¹ Comments of Telegate AG in CC Docket No. 99-273 at 6 (filed Oct. 13, 1999).

¹² Notice at 3.

updates) from all ILECs. Moreover, ILECs must make available all DA listings to DA providers at true, cost-based rates.¹³

One way that Metro One differentiates itself from its competitors, including the ILECs, is the quality of its DA listing database. Since the ILECs clearly have the highest quality DA listing databases,¹⁴ Metro One is required to purchase the DA listings from the ILECs. Metro One then enhances the name, address and telephone number data obtained from the ILECs' data with data from other sources, such as movie listings and local event listings. Currently, Metro One is forced to pay many times the true cost-based rates to acquire the ILEC DA listings. It is Metro One's experience that the ILECs are refusing to provide all of their listings at cost-based rates.

A DA database administrator, and the expenses associated with the administrator, would be unnecessary if the Commission would require the ILECs to provide *all* of their DA listings to *all* competitive DA providers at true, cost-based rates, irrespective of whether the competitive carriers are certified telecommunications carriers.

¹³ Reply Comments of Metro One Telecommunications, Inc. in CC Docket No. 99-273, at 16 & n.50 (filed Oct. 28, 1999) (citing Metro One Comments, and Comments of Time Warner and Excell).

¹⁴ See e.g. U S WEST Order ¶ 35 ("U S WEST has access to a more complete, accurate and reliable database than its competitors. This, in turn, gives U S WEST a competitive advantage in the provision of directory assistance service throughout its region.").

III. CONCLUSION

WHEREFORE, for the foregoing reasons, Metro One respectfully requests that the Commission take such actions as are consistent with these Comments.

Respectfully submitted,

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May 30, 2000

CERTIFICATE OF SERVICE

I, Kathryn J. Pettipas, do hereby certify that on this 30th day of May, 2000,
I have caused a copy of the foregoing COMMENTS OF METRO ONE
TELECOMMUNICATIONS, INC. to be served via first-class United States mail,
postage pre-paid, upon the persons listed on the attached service list.


Kathryn J. Pettipas

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